## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

§
8
§
§ CIVIL ACTION No. 6:20-cv-00569-ADA
§
§ JOINT MOTION TO STAY ALL
§ DEADLINES AND NOTICE OF
§ SETTLEMENT
§
§

## JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiffs Sable Networks, Inc. and Sable IP, LLC and Defendants Dell Technologies Inc.; Dell Inc.; and EMC Corporation (collectively, the "Parties") file this Joint Motion to Stay All Deadlines and Notice of Settlement. The Parties hereby notify the Court that all matters related to the case between the parties have been resolved, in principle. The parties request that the Court stay all unreached case deadlines applicable between the Parties for thirty (30) days so the appropriate dismissal papers may be submitted to dismiss all claims between them in this action.

Dated: January 4, 2021 Respectfully submitted,

/s/ Daniel P. Hipskind

Elizabeth L. DeRieux State Bar No. 05770585 Capshaw DeRieux, LLP 114 E. Commerce Ave. Gladewater, TX 75647

Telephone: (903)235-2833

Email: ederieux@capshawlaw.com

Dorian S. Berger (CA SB No. 264424) Daniel P. Hipskind (CA SB No. 266763) BERGER & HIPSKIND LLP 9538 Brighton Way, Ste. 320 Beverly Hills, CA 90210

Telephone: 323-886-3430 Facsimile: 323-978-5508

E-mail: dsb@bergerhipskind.com E-mail: dph@bergerhipskind.com

Attorneys for Sable Networks, Inc. and Sable IP, LLC

## By: /s/ Brady Cox

Michael John Newton (TX. Bar No. 24003844)

Brady Cox (TX. Bar No. 24074084)

**ALSTON & BIRD LLP** 

2200 Ross Avenue, Suite 2300

Dallas, Texas 75201 Phone: (214) 922-3400 Fax: (214) 922-3899 mike.newton@alston.com brady.cox@alston.com

Emily Chambers Welch (GA Bar No. 606071)

(pro hac vice)

ALSTON & BIRD LLP

One Atlantic Center 1201 W. Peachtree Street NE, Suite 4900

Atlanta, Georgia 30309 Telephone: (404) 881-7000 emily.welch@alston.com

Lauren N. Griffin (NC Bar No. 54766) (pro hac vice)

ALSTON & BIRD LLP

101 S. Tryon Street, Suite 4000
Charlotte, North Carolina 28280
Telephone: (704) 444-1000
lauren.griffin@alston.com

Attorneys for Defendants Dell Technologies Inc., Dell Inc., and EMC Corporation.

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing was electronically filed on January 4, 2021 using the Court's CM/ECF system, which will send notice of such filing to all counsel of record who are deemed to have consented to electronic service.

/s/ Daniel P. Hipskind
Daniel P. Hipskind